

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JOHN J. O'BRIEN, ET AL.

NO. 12-CR-40026-WGY

**DEFENDANT TAVARES' REQUEST
FOR ADDITIONAL TIME FOR CLOSING ARGUMENT**

Defendant Elizabeth Tavares, by and through undersigned counsel, hereby respectfully requests this Honorable Court grant to undersigned counsel, Mr. Bailey, an additional five (5) minutes for closing argument, for a total of thirty-five (35) minutes. As grounds therefor, Tavares avers that additional time is necessary given the nature and number of charges (8 counts of mail fraud, 1 count of racketeering conspiracy, 1 count of racketeering, and 17 racketeering acts). Sixty (60) witnesses have testified during this trial over the course of 35 days of testimony. The jury will be considering over 200 exhibits. Moreover, both the government and Mr. O'Brien were granted an additional fifteen (15) minutes for their closing. An additional five (5) minutes of time will adequately allow Mr. Bailey to make final argument (and is proportionate given the fact that Tavares faces fewer predicate acts than Mr. O'Brien), and it will unduly prejudice neither the jury, the court, nor the other parties.

WHEREFORE, Elizabeth Tavares respectfully requests this Honorable Court grant her defense counsel an additional five (5) minutes for his closing in the interest of justice.

Dated: July 15, 2014

Respectfully submitted,

ELIZABETH TAVARES
By and through her attorneys,

/s/ R. Bradford Bailey

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CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing [NEF] and paper copies will be sent to those indicated as non-registered participants.

/s/ Adamo Lanza